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JUN 06 2013

PUBLIC SERVICE

COMMISSION

JACK B. BATES

IRIS G. SKIDMORE

Via Hand-Delivery

June 6, 2013

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

Re: Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates

Case No. 2013-00167

Dear Mr. Derouen:

Enclosure

Enclosed for filing in the above styled action are an original and ten copies of the Motion for Full Intervention on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,

III G. BRIGING

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JUN 06 2013
PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA)	
GAS OF KENTUCKY, INC. FOR AN)	CASE NO. 2013-00167
ADJUSTMENT OF RATES)	

MOTION FOR FULL INTERVENTION

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and pursuant to 807 KAR 5:001 Section 4(11) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine the request of Columbia Gas of Kentucky, Inc. for an adjustment of rates. A rate increase will have a significant impact on persons with low-income in the Columbia Gas of Kentucky, Inc. service territory.

CAC, whose address is P.O. Box 11610, Lexington, KY 40576, is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents in Columbia Gas of Kentucky, Inc.'s service territory. As such, CAC has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAC's interests are not adequately represented by the other parties to this proceeding. No other party's interest in this proceeding is the low-income citizens of the Columbia Gas of Kentucky, Inc. service territory. CAC will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAC will not unduly delay these proceedings, or unduly complicate or disrupt them.

CAC has participated in numerous other rate cases with the applicant, and other utilities. In those cases, CAC has represented the interests of the low-income population in affordability of essential gas, electricity, and water. CAC expects to present the testimony of Charles Lanter,

and may choose to present testimony of other witnesses not yet identified.

WHEREFORE, CAC requests that it be granted leave for full intervention and that it be certified as a full party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully submitted,

IRIS G. SKIDMORE

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Telephone: (502)-352-2930 Facsimile: (502)-352-2931

COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2013, a true and accurate copy of the foregoing Motion for Full Intervention was served by United States mail, postage prepaid, to the following:

Hon. Stephen B. Seiple Columbia Gas of Kentucky, Inc. 200 Civic Center Drive P.O. Box 117 Columbus, OH 43216-0117

Hon. Richard S. Taylor 225 Capital Avenue Frankfort, KY 40601

Hon. David J. Barberie Department of Law 200 East Main St. Lexington, KY 40507

Hon. Dennis G. Howard II Assistant Attorney General Office of the Attorney General 1024 Capitol Center Drive, Suite 200

Frankfort, KY 40601

Counsel for CAC